

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**KATHRYN OAKLEY,**

Plaintiff,

**vs.**

**UNITED RECOVERY  
SYSTEMS, L.P.,**

Defendant.

**Civil Action No.**

**NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE THAT**, pursuant to 28 U.S.C. § 1441(b) and 28 U.S.C. § 1331, Defendant, United Recovery Systems, L.P. ("URS"), by and through its Counsel, Marshall, Dennehey, Warner, Coleman & Goggin, P.C., hereby removes the action captioned Kathryn Oakley v. United Recovery Systems, L.P., docket no. 11-cv-03791, as filed in the Court of Common Pleas of Lackawanna County, Pennsylvania ("the Action"), to the United States District Court for the Middle District of Pennsylvania, based upon the following:

1. On or about May 26, 2011, Plaintiff filed the Action in the Court of Common Pleas of Lackawanna County,

Pennsylvania. A true and correct copy of Plaintiff's Complaint in the Action is attached hereto as Exhibit "A."

2. URS first received notice of the Action on or around June 6, 2011, when it was served with Plaintiff's Complaint via certified mail.

3. Based on the foregoing, URS has timely filed this Notice of Removal within thirty days of the filing of the Complaint, within thirty days of being served with the Complaint and within thirty days of the date that the Action was first removable. See 28 U.S.C. § 1446(b).

4. The Action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by URS pursuant to the provisions of 28 U.S.C. § 1441(b), in that Plaintiff has alleged, *inter alia*, that URS violated the Fair Debt Collections Practices Act, 15 U.S.C. § 1692, et seq., thereby asserting a claim that arises under federal law.

5. In that the cause of action alleged by the Plaintiff arises from the performance of obligations of the parties within Lackawanna County, Pennsylvania, the United States District

Court for the Middle District of Pennsylvania should be assigned the Action.

6. Pursuant to 28 U.S.C. § 1446(d), URS will file a copy of this Notice of Removal with the Clerk of the United States District Court for the Middle District of Pennsylvania, will serve Plaintiff with copies of this Notice of Removal and will file the Notice of Removal in the County Court of Common Pleas of Lackawanna County, Pennsylvania.

**WHEREFORE**, United Recovery Systems, L.P., notifies this Court that this cause is removed from the Court of Common Pleas of Lackawanna County, Pennsylvania to the United States District Court for the Middle District of Pennsylvania pursuant to the provisions of 28 U.S.C. §§1331, and 1446.

Respectfully submitted,

**MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN**

By:



RONALD M. METCHO, ESQUIRE  
1845 Walnut Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19103  
(215) 575-2595 / (215) 575-0856 (f)  
rmmetcho@mdwcg.com  
Attorneys for Defendant  
United Recovery Systems, L.P.

Dated: June 27, 2011

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**KATHRYN OAKLEY,**

Plaintiff,

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**UNITED RECOVERY  
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Defendant.

**Civil Action No.**

**CERTIFICATE OF SERVICE**

I, Ronald M. Metcho, Esquire, do hereby certify that a true and correct copy of Defendant, United Recovery Systems, L.P.'s, **Notice of Removal** was served upon the below-listed counsel of record by regular mail on June 27, 2011.

Kristin Sabatini, Esquire  
216 N. Blakely Street  
Dunmore, PA 18512  
Attorney for Plaintiff  
Kathryn Oakley

**MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN**

By:



RONALD M. METCHO, ESQUIRE  
Attorneys for Defendant  
United Recovery Systems, L.P.